

EXHIBIT N

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA

JANE DOES 1-9,

PLAINTIFFS

vs.

COLLINS MURPHY et al.

DEFENDANTS

C/A No. 7:20-CV-00947-DCC

**DECLARATION OF DANI PINTER IN
SUPPORT OF PLAINTIFFS' OPPOSITION
TO DEFENDANTS TRAFFIC STARS,
LTD, WISEBITS IP HOLDINGS, AND
WISEBITS LTD'S MOTIONS TO
DISMISS PLAINTIFFS' FIFTH
AMENDED COMPLAINT**

I, Dani Pinter, declare as follows:

1. I am an attorney licensed to practice law in Florida, admitted pro hac vice in this District Court, and counsel of record for Plaintiffs in the above captioned matter. I make this declaration based on my personal knowledge of this matter and the information I obtained following a reasonable investigation of the xHamster.com website described below. If called as a witness, I could and would testify competently to the matters stated herein.
2. On February 9, 2023, I accessed a video on the xHamster website, using my Brave internet browser¹, titled "Robin's Nest (1980)" located at <https://xhamster.com/videos/robin-s-nest-1980-xhc3zbM>. Then I examined the information the browser was receiving from the website.
3. **Exhibit 1** is a true and accurate copy of the information my internet browser received at the time I accessed the xHamster website on February 9, 2023. I added arrows and annotations to pinpoint the information described herein. The IP address the browser connected to was 104.18.156.3, which is registered to Cloudflare in California. See <https://viewdns.info/whois/?domain=104.18.156.3>.
4. **Exhibit 2** is a true and accurate copy of the information my internet browser received at the time I accessed the xHamster website on February 9, 2023. I added arrows and annotations to pinpoint the information described herein. The browser also shows it received information from tsyndicate.com. This appears to be the domain used to deliver ad content on xhamster.com from TrafficStars. See **Exhibit 3**. TrafficStars documentation for website developers identifies tsyndicate.com as the URL used to connect to the TrafficStars platform. See <https://rtb-docs.trafficstars.com/#/>. The browser connected to 8.253.154.227. This server

¹ See <https://brave.com>.

is registered to Lumen, a U.S. company. See <https://viewdns.info/whois/?domain=8.253.154.227>.

5. **Exhibit 3** is a true and accurate copy of the information displayed when I clicked the URL associated with the Traffic Stars ad connected to the IP address 8.253.154.227 described above in paragraph 4. I added an arrow and annotation to pinpoint the information described herein.
6. **Exhibit 4** is a true and accurate copy of the information my internet browser received at the time I accessed the xHamster website on February 9, 2023 for the video titled “Robin’s Nest (1980)”. I added arrows and annotations to pinpoint the information described herein. The browser also showed that it received information from other servers, for example servers with the domain “xhcdn.com.” This appears to be a server for video content on the site as the URL references “video.” Hammy Media LTD identified xhcdn.com as one of their domains. See https://cdn.loc.gov/copyright/onlinesp/agents/h/hammy_media2.pdf. The browser connected to IP address 8.248.3.236 registered with Lumen in the U.S. See <https://viewdns.info/whois/?domain=8.248.3.236>.
7. **Exhibit 5** is a true and accurate copy of the information my internet browser received at the time I accessed the xHamster website on February 9, 2023. I added arrows and annotations to pinpoint the information described herein. The browser showed that it received information from the server with the domain “xhcdn.com” which also appears to be a server for thumbnail content on the site as the URL references “thumb.” Hammy Media LTD identified xhcdn.com as one of their domains. See https://cdn.loc.gov/copyright/onlinesp/agents/h/hammy_media2.pdf. The browser connected to IP address 8.251.181.121 registered with Lumen in the U.S. See <https://viewdns.info/whois/?domain=8.251.181.121>.
8. **Exhibit 6** is a true and accurate copy of the information my internet browser received at the time I accessed the xHamster website on February 9, 2023. I added an arrow and annotation to pinpoint the information described herein. The browser showed that the xHamster website was using Google analytics to gather and analyze data. See <https://analytics.google.com/analytics/web/provision/#/provision>.
9. In addition to the video and associated data that I accessed as detailed in above Paragraphs 2-8, I accessed a video titled “Young girl changes clothes in the locker room after school.” **Exhibit 7** is a true and accurate copy of information displayed on the xHamster website, with explicit content redacted, when I accessed that video. I used a Virtual Private Network (VPN) to connect to the website using a Washington, D.C. IP address. As a result, the ads displayed by TrafficStars alongside the video were all targeted to the Washington, D.C. area.
10. Additionally, I accessed a third video titled “Camera in Public Bathroom and Girl with Big Ass Pissing, Very Sexy.” **Exhibit 8** is a true and accurate copy of information displayed on the xHamster website, with explicit content redacted, when I accessed that video. At the top of the video were suggested related categories of videos, one titled “Hidden Camera.” Below the

video were suggested related videos which included similar instances of surreptitious recording.

I declare under penalty of perjury that the foregoing is true and correct. This declaration was executed on February 20, 2023.

/s/ Dani Pinter
Dani Pinter

Exhibit 1

Robin's Nest 1980: Free Sexes H x IP/DNS Detect - What is your IP, wh +

xhamster.com/videos/robin-s-nest-1980-xhc3zbM

XHAMSTER US Search for videos

Videos - Live Sex - Pornstars - Creators - Channels - Photos - Dating

Robin's Nest (1980) 950,663 99 %

The_Best_Video **Subscribe 9.9K** Arcadia Lake Eric Edwards Paul Thomas

Please select your preferred version of xHamster:

Location: United States

Search...

India Malaysia Russian Federation Pakistan Algeria Afghanistan Albania

Cookies help us deliver our services. By using this website, you agree with our use of cookies. [Learn more](#) **OK**

Elements Console Sources **Network** Performance Memory Application

Filter ☐ Invert ☐ Hide data URLs ☒ All Fetch/XHR JS CSS Img Media Font Doc WS Wasm Manifest Other

☐ Has blocked cookies ☐ Blocked Requests ☐ 3rd-party requests

50000 ms 100000 ms 150000 ms 200000 ms 250000 ms 300000 ms 350000 ms 400000 ms

Name

- 320.4.50.17.webp
- 320.4.50.19.webp
- 320.4.50.18.webp
- 320.4.50.17.webp
- 320.4.50.23.webp
- 320.4.50.22.webp
- 320.4.50.0.webp
- ☒ vast?spot=ebb7dda26f2945.
- ☒ vast?spot=ebb7dda26f2945.
- ☐ _TPL_h264.mp4.m3u8
- ☐ 144p.h264.mp4.m3u8
- ☐ _TPL_h264.mp4.m3u8
- ☐ 144p.h264.mp4.m3u8
- ☒ gtm.js?id=GTM-TLDPV3J
- ☒ gtm.js?id=GTM-TLDPV3J
- ☒ gtm.js?id=GTM-TLDPV3J
- ☒ robin-s-nest-1980-xhc3zbM
- ☒ robin-s-nest-1980-xhc3zbM
- ☒ xhamster.com
- ☐ W3siaWQIOi5NmQyZGVINil.
- ☐ manifest.webmanifest
- ☐ W3siaWQIOi5NmQyZGVINil.
- ☐ manifest.webmanifest
- ☐ W3siaWQIOi5NmQyZGVINil.
- ☐ manifest.webmanifest

563 requests 14.1 MB transferred

Headers Preview Response Initiator Timing Cookies

General

Request URL: <https://xhamster.com/>

Request Method: GET

Status Code: 200

Remote Address: 104.18.156.3:443

Referrer Policy: unsafe-url

Response Headers

cache-control: no-cache, no-store, must-revalidate

cf-cache-status: DYNAMIC

cf-ray: 796f7013fe4a82c6-IAD

content-encoding: br

content-security-policy: frame-ancestors 'self'

content-type: text/html; charset=UTF-8

date: Thu, 09 Feb 2023 20:43:32 GMT

nel: {"success_fraction":0,"report_to":"cf-nel","max_age":604800}

report-to: {"endpoints":[{"url":"https://a.nel.cloudflare.com/report/v3?s=SviQY3NHK%2F57tVqxFuJvF5VA0mGgdFM0htiNEh6Vo9uPxsLUA%2FGE5AgBmIb5L4Y2tgW0pho8zAjl3v0riLy0qLbC6XTkYw%2Fnhi28QdL%2BaLv00qPMG6MZqLLfNLGSQw%3D%3D"}],"group":"cf-nel","max_age":604800}

server: cloudflare

set-cookie: xh_v2_exp_52=%7B%22n%22%3A%22exp_52%22%2C%22g%22%3A%22a%22%2C%22jt%22%3A1675975411%2C%22ver%22%3A15%7D; expires=Fri, 09-Feb-2024 20:43:31 GMT; Max-Age=31535999; path=/; domain=.xhamster.com; secure; SameSite=None

set-cookie: xh_v2_exp_5012=%7B%22n%22%3A%22exp_5012%22%2C%22g%22%3A%22c%22%2C%22jt%22%3A1675975411%2C%22ver%22%3A1%7D; expires=Wed, 10-May-2023 20:43:31 GMT; Max-Age=7775999; pa

This IP address is registered to Cloudflare located in California.

See <https://viewdns.info/whois/?domain=104.18.156.3>

Exhibit 2

Robin's Nest 1980: Free Sexs H x IP/DNS Detect - What is your IP, wh +

xhamster.com/videos/robin-s-nest-1980-xhc3zbM

XHAMSTER US Search for videos

Videos ▾ Live Sex ▾ Pornstars ▾ Creators ▾ Channels ▾ Photos ▾ Paid Videos

Robin's Nest (1980) 950,691 99 %

The_Best_Video Subscribe 9.9K Arcadia Lake Eric Edwards Paul Thomas

Please select your preferred version of xHamster:

Location: United States

Search...

India Malaysia Russian Federation Pakistan Algeria Afghanistan Albania

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Network

Filter: ☐ Invert ☐ Hide data URLs ☒ All Fetch/XHR JS CSS Img Media Font Doc WS Wasm Manifest Other

☐ Has blocked cookies ☐ Blocked Requests ☐ 3rd-party requests

100000 ms 200000 ms 300000 ms 400000 ms 500000 ms 600000 ms 700000 ms 800000 ms 900000 ms 1000000 ms 1100000 ms 1200000 ms 1300000 ms

Name

55432067
81188669
91592856
103397580
19113917
100258397
interstitial.ts.css
interstitial.ts.js
ad.js
interstitial.ts.css
interstitial.ts.js
master.spot.js
ad.js
interstitial.ts.css
interstitial.ts.js
master.spot.js
b.b.js
b.b.js
main.jpg
b.b.js
main.jpg
main.webp
main.webp
main.webp

Headers

General

Request URL: https://lcdn.tsyndicate.com/images/1/3/0b1a2329622a9f4e1bcc98e8b83a8499fe48f/main.jpg
Request Method: GET
Status Code: 200
Remote Address: 8.253.154.227
Referrer Policy: unsafe-url

Response Headers

accept-ranges: bytes
age: 6458
content-encoding: gzip
content-length: 10467
content-type: image/jpeg
date: Thu, 09 Feb 2023 20:48:30 GMT
etag: W/"63e486ef-2915"
last-modified: Thu, 09 Feb 2023 05:38:55 GMT
server: nginx
vary: Accept-Encoding
x-robots-tag: noindex, nofollow

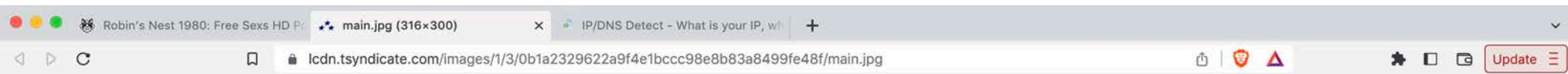
Request Headers

:authority: lcdn.tsyndicate.com
:method: GET
:path: /images/1/3/0b1a2329622a9f4e1bcc98e8b83a8499fe48f/main.jpg

857 requests 22.9 MB transferred

This IP address for the Traffic Stars delivered ad is registered with Lumen, in the U.S. See <https://viewdns.info/whois/?domain=8.253.154.227>

Exhibit 3



tsyndicate.com URL associated with Traffic Stars



Exhibit 4

Robin's Nest 1980: Free Sexs H x IP/DNS Detect - What is your IP, w

xhamster.com/videos/robin-s-nest-1980-xhc3zbM

XHAMSTER US Search for videos

Videos • Live Sex • Pornstars • Creators • Channels • Photos • Paid Videos

Robin's Nest (1980) 950,691 99 %

The_Best_Video **Subscribe 9.9K** Arcadia Lake Eric Edwards Paul Thomas

Please select your preferred version of xHamster:

Location: United States

Search...

India Malaysia Russian Federation Pakistan Algeria Afghanistan Albania

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Elements Console Sources Network Performance Memory Application

Filter ☐ Invert ☐ Hide data URLs All Fetch/XHR JS CSS Img Media Font Doc WS Wasm Manifest Other

☐ Has blocked cookies ☐ Blocked Requests ☐ 3rd-party requests

100000 ms 200000 ms 300000 ms 400000 ms 500000 ms 600000 ms 700000 ms 800000 ms

Name

- 320.4.50.0.webp
- 320.4.50.0.webp
- 320.4.50.21.webp
- 320.4.50.22.webp
- 320.4.50.21.webp
- 320.4.50.18.webp
- 320.4.50.17.webp
- 320.4.50.19.webp
- 320.4.50.18.webp
- 320.4.50.17.webp
- 320.4.50.23.webp
- 320.4.50.22.webp
- 320.4.50.0.webp
- ☐ vast?spot=ebb7dda26f2945.
- ☐ master?subid_4=The_Best_...
- ☐ master?subid_4=The_Best_...
- ☐ master?subid_4=The_Best_...
- ☐ vast?spot=ebb7dda26f2945.
- ☐ vast?spot=ebb7dda26f2945.
- ☐ _TPL_h264.mp4.m3u8
- ☐ 144p.h264.mp4.m3u8
- ☐ _TPL_h264.mp4.m3u8
- ☐ 144p.h264.mp4.m3u8
- ☐ _TPL_h264.mp4.m3u8
- ☐ 144p.h264.mp4.m3u8

827 requests 22.7 MB transferr

Headers Preview Response Initiator Timing

General

Request URL: https://video-lmo.xhcdn.com/token=nva=1675987200~dirs=5~hash=02ca3de1cf4e0a312d711/media=hls4/multi=256x144:144p,426x240:240p,854x480:480p,1280x720:720p/016/580/738/_TPL_h264.mp4.m3u8

Request Method: GET

Status Code: 200

Remote Address: 8.248.3.236:443

Referrer Policy: unsafe-url

Response Headers

accept-ranges: bytes

access-control-allow-credentials: true

access-control-allow-headers: *

access-control-allow-methods: HEAD, GET, OPTIONS

access-control-allow-origin: *

access-control-expose-headers: Server, Range, Content-Length, Content-Range

access-control-max-age: 31536000

age: 25188082

cache-control: public, max-age=31536000

content-length: 478

content-type: application/vnd.apple.mpegurl

date: Thu, 09 Feb 2023 20:48:28 GMT

expires: Sat, 17 Jun 2023 21:05:59 GMT

server: nginx/1.20.1

timing-allow-origin: *

This IP address is registered with Lumen, in the U.S.. See <https://viewdns.info/whois/?domain=8.248.3.236>

Exhibit 5

Robin's Nest 1980: Free Sexs H x IP/DNS Detect - What is your IP, wh +

xhamster.com/videos/robin-s-nest-1980-xhc3zbM

XHAMSTER US Search for videos

Videos • Live Sex • Pornstars • Creators • Channels • Photos • Paid Videos

Robin's Nest (1980) 950,691 99 %

The_Best_Video **Subscribe** 9.9K Arcadia Lake Eric Edwards Paul Thomas

Please select your preferred version of xHamster:

Location: United States

Search...

India Malaysia Russian Federation Pakistan Algeria Afghanistan Albania

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Elements Console Sources Network Performance Memory Application

Filter ☐ Invert ☐ Hide data URLs ☒ All Fetch/XHR JS CSS Img Media Font Doc WS Wasm Manifest Other

☐ Has blocked cookies ☐ Blocked Requests ☐ 3rd-party requests

100000 ms 200000 ms 300000 ms 400000 ms 500000 ms 600000 ms 700000 ms 800000 ms 900000 ms 1000000 ms

Name

- async-5e21186a8c1ab4f1c6.
- async-ecfd06dbd1890e7c6f.
- async-fbfbac909e8c08b92.
- async-0df692136146020c0c.
- async-c673f5fea25c188991..
- async-d4520b9480ac3cf536.
- async-da85a3f4d4fb735838..
- async-de35e1606067ade2d.
- async-97410ffb6e53f6e47ee.
- async-531d15d2193a3b74c..
- async-54382dce1e071a5ed..
- async-7983dc528757c636c..
- async-0ce9db43f226d7f3ce..
- favicon.ico?1
- android-chrome-192x192.png
- favicon.ico?1
- 2560x1440.281.webp
- 2560x1440.281.webp
- 2560x1440.281.webp
- logo.jpg.v1627306783
- logo.jpg.v1631531480
- logo.jpg.v1631531405
- logo.jpg.v1631531276
- logo.jpg.v1545388459

Headers Preview Response Initiator Timing

General

Request URL: https://thumb-lvlt.xhcdn.com/a/~ipEdbnahysRl0aDgIMNxg/016/580/738/v2/2560x1440.281.webp

Request Method: GET

Status Code: 200

Remote Address: 8.251.181.121:443

Referrer Policy: unsafe-url

Response Headers

accept-ranges: bytes

age: 21987

cache-control: max-age=604800

content-length: 69636

content-type: image/webp

date: Thu, 09 Feb 2023 20:44:00 GMT

etag: "6206e1d0-11004"

expires: Thu, 16 Feb 2023 14:37:39 GMT

last-modified: Fri, 11 Feb 2022 22:23:12 GMT

server: nginx/1.14.0 (Ubuntu)

timing-allow-origin: *

x-proxy-cache: MISS,MISS

Request Headers

:authority: thumb-lvlt.xhcdn.com

:method: GET

851 requests 22.9 MB transferr

This IP address is registered with Lumen, in the U.S.. See https://viewdns.info/whois/?domain=8.251.181.121

Exhibit 6

The screenshot displays a web browser window with the URL `xhamster.com/videos/robin-s-nest-1980-xhc3zbM`. The page shows a video player for "Robin's Nest (1980)" with 950,691 views and a 99% like rate. A modal dialog prompts the user to select a preferred version of xHamster, listing various countries. The browser's developer tools are open to the Network tab, showing a list of requests. A red arrow points to the request for `robin-s-nest-1980-xhc3zbM` from the domain `xhamster.com`, which is a document type with a size of 30.9 kB and a time of 434 ms. The table below provides a detailed view of the network requests.

Name	Sta...	Domain	Remote Address	Type	Size	Time	Waterfall
master.m3u8	200	vlcdn.tsyndicate.c...	8.251.243.249:...	xhr	600 B	576 ms	
850x480.m...	200	vlcdn.tsyndicate.c...	8.251.243.249:...	xhr	568 B	140 ms	
850x480_0...	200	vlcdn.tsyndicate.c...	8.251.243.249:...	xhr	1.1 MB	367 ms	
850x480_0...	200	vlcdn.tsyndicate.c...	8.251.243.249:...	xhr	640 kB	124 ms	
850x480_0...	200	vlcdn.tsyndicate.c...	8.251.243.249:...	xhr	505 kB	91 ms	
analytics.js	200	www.google-analy...	172.253.62.10...	script	20.4 kB	231 ms	
optimize.js...	200	www.googleoptimi...	142.251.163.1...	script	48.3 kB	314 ms	
gtm.js?id=...	(blo...	www.googletagma...		script	0 B	115 ms	
gtm.js?id=...	(blo...	www.googletagma...		script	0 B	80 ms	
gtm.js?id=...	200	www.googletagma...	142.251.163.9...	script	95.2 kB	604 ms	
gtm.js?id=...	(blo...	www.googletagma...		script	0 B	507 ms	
robin-s-nes...	200	xhamster.com	104.18.156.3:443	docum...	30.9 kB	434 ms	
robin-s-nes...	200	xhamster.com	104.18.156.3:443	docum...	30.9 kB	480 ms	
xhamster.c...	200	xhamster.com	104.18.156.3:443	docum...	38.4 kB	1.54 s	
W3siaWQi...	200	xhamster.com	104.18.156.3:443	fetch	2.7 kB	271 ms	
manifest.w...	200	xhamster.com	104.18.156.3:443	manifest	595 B	60 ms	
W3siaWQi...	200	xhamster.com	104.18.156.3:443	fetch	2.7 kB	184 ms	
manifest.w...	200	xhamster.com	104.18.156.3:443	manifest	721 B	60 ms	
W3siaWQi...	200	xhamster.com	104.18.156.3:443	fetch	2.7 kB	151 ms	
blob:http...	200	xhamster.com		text/jav...	0 B	1 ms	
manifest.w...	200	xhamster.com	104.18.156.3:443	manifest	716 B	49 ms	
W3siaWQi...	200	xhamster.com	104.18.156.3:443	fetch	2.8 kB	160 ms	
manifes...	200	xhamster.com	104.18.156.3:443	manifest	635 B	51 ms	
robin-s-nes...	200	xhamster.com	104.18.156.3:443	docum...	31.2 kB	473 ms	

815 requests | 22.6 MB transferred | 39.3 MB resources | Finish: 6.5 min | DOMContentLoaded: 6.4 min | Load: 6.5 min

Using Google analytics

Exhibit 7

VALENTINE'S DAY 🍷 Up to 50% OFF sale [Join FapHouse](#)



Young girl changing clothes in the locker room after school 88,848 views 100 % liked

Anya Sweetie

[Subscribe](#) 2.2K

18 Year Old

Bisexual

European

HD Videos

Nipples

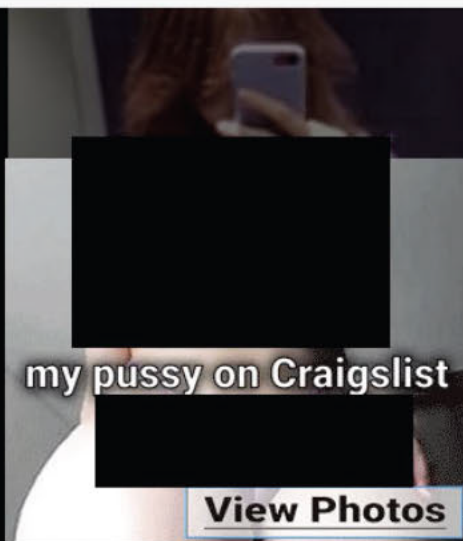
Skinny

Softcore

Teen (18+)

Tight Pussy

18 Tight Pussy



Ad BongaCams.com

Hide Ads

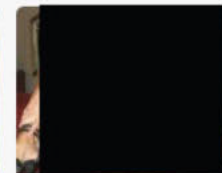


Buy NFT & Hide Ads

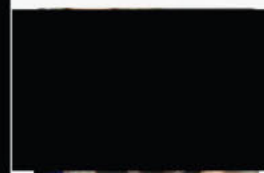
Ads by TrafficStars



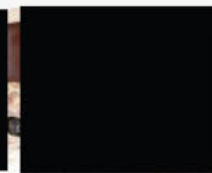
Craigslist for Sex in Washington Tonight
Fuck local matures >



👉 Washington - Local moms need
Mature Nearby >



👉 Chat with mature ladies from
Horny women from >



Craigslist for Sex in Washington Tonight
Fuck local matures >



👉 Washington, Laura - 43 years old
Mature Nearby 🔥 >



Washington - Melissa (45 years)
👉 Looking for sex in >

[More Girls](#) >



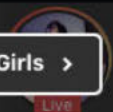
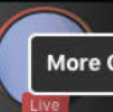
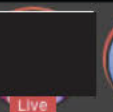
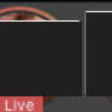
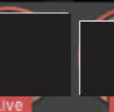
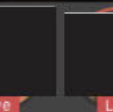
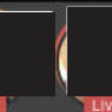
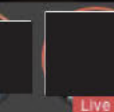
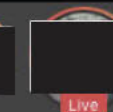
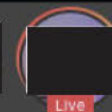
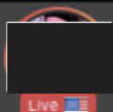
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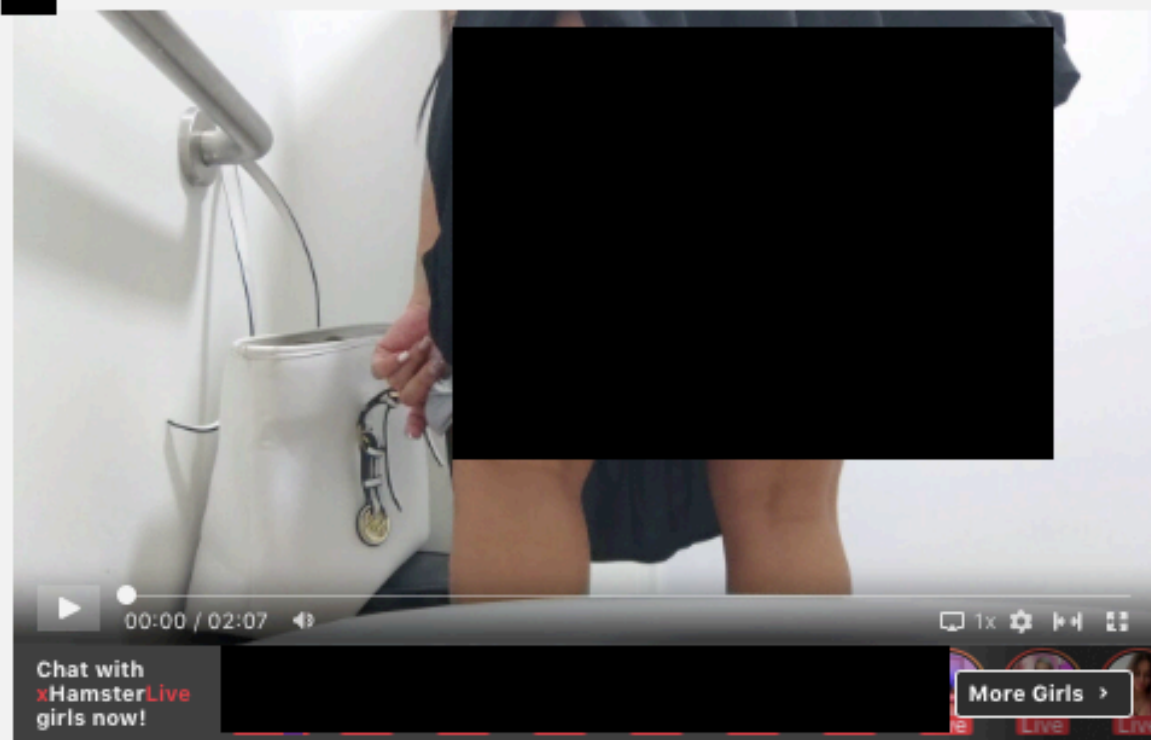


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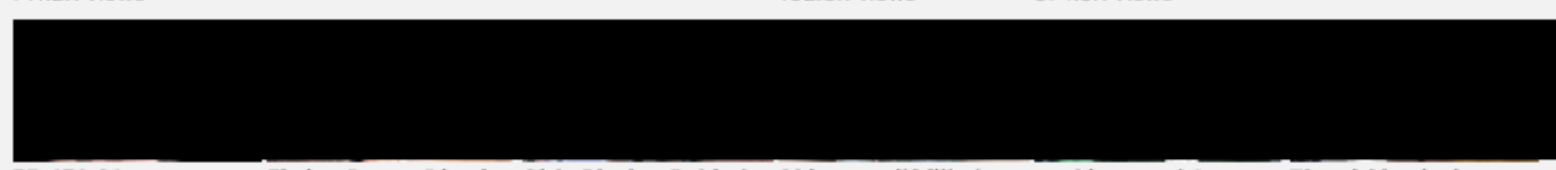
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